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Dee May  
Director  
Federal Regulatory Affairs

December 14, 1999

EX PARTE OR LATE FILED



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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Ex Parte

Ms. Magalie Roman Salas  
Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

Re: CC Docket No. 99-295: In the Matter of Application of Bell Atlantic Pursuant to Section 271 of the Telecommunications Act of 1996 to Provide In-Region, InterLATA Services in New York

Dear Ms. Salas,

Please find attached a copy of a letter Bell Atlantic sent to Mr. L. Malone, General Counsel of the New York State Public Service Commission on December 10, 1999. The letter is being placed on the record at the request of the Common Carrier Bureau staff in the above proceeding.

As outlined in the Public Notice (DA-99-2014) issued by the FCC on September 29, 1999, the 20 page ex parte limit does not apply to this ex parte since Bell Atlantic is responding to a staff request.

Please feel free to contact me with any questions.

Sincerely,

Handwritten signature of Dee May in cursive script.  
Attachment

cc: A. Kearney  
C. Matthey  
J. Patterson

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List ABCDE

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**Randal S. Milch**  
Associate General Counsel,  
State Regulatory North

December 10, 1999

**BY HAND**

Lawrence G. Malone, Esq.  
General Counsel  
New York State Public Service Commission  
Three Empire State Plaza  
Albany, New York 12223-1350

**Re: Case 97-C-0271**

Dear Mr. Malone:

I wanted to apprise you of Bell Atlantic-New York's continuing efforts to (1) increase the flow through of orders from our CLEC customers to our service order processing systems, (2) assure efficient response on orders that do not flow through, and (3) achieve improvement in DSL performance.

**Flow Through Enhancements**

As set out in the Miller/Sullivan/Zanfini Affidavit of October 8, 1999, ("Affidavit"), BA-NY promised – subject to CLEC approval in Change Control – to implement a series of systems changes on October 30 in order to increase overall flow through levels. Affidavit at ¶¶ 11-12. After meetings with the CLECs, 4 of the 5 "Phase I" changes were implemented as promised. On a transaction basis,<sup>1</sup> the October system changes produced a 6-point improvement in UNE-P flow through from October to November. This improvement is less than predicted because the invalid address systems change was not made following discussions with the CLECs. The combined UNE flow-through shows a 9-point improvement. The "all-orders" flow through rate improved by 10 points.

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<sup>1</sup> For October 1999 and previous months, BA-NY's Carrier-to-Carrier results for flow through percentages and the related ordering metrics were produced on a completed-order basis. Beginning with November 1999 results – in accordance with the orders of the Commission – BA-NY will begin reporting flow through and ordering metrics on a transaction or confirmed order basis.

The October 8 commitment also included flow through improvements for Phases II and III. Phase II, which is currently scheduled to be implemented by December 18, will proceed as planned, except that three of the changes continue to be under discussion and may be delayed based upon discussions with affected CLECs. The status on Phase III changes, which are scheduled to be implemented by the end of the second quarter 2000, remains unchanged. We will keep you apprised of the status of the delayed improvements as well as new improvements that are made.

For instance, in addition to the above-described improvements, BA-NY has identified 4 systems changes which will be implemented on December 18, 1999, and which will materially increase resale flow through. As described in more detail on Attachment 1, these changes will provide flow through on orders that, prior to these systems changes, generated a significant number of error messages to the CLECs. As a result of these system improvements, we forecast the resale flow-through rate to increase by as much as 20 points, subject to possibility that there may be other errors on orders that would be flow-through candidates. This is also subject to the usual variances that may occur due to changing order mixes.

#### Continuing CLEC Education Efforts

As promised in ¶ 10 of the Affidavit, BA-NY has begun the process of holding "monthly workshops to address specifically the improvement of LSR order quality." BA-NY hosted the first monthly Wholesale Flow Through Workshop on November 10, 1999 from 10:00 a.m. - 1:00 p.m. at 140 West Street, New York. Forty-nine individuals attended in-person or by telephone on behalf of nine CLECs. Eleven BA-NY experts attended to provide support and answer questions. The next workshop is scheduled for December 15, 1999, at 1095 6<sup>th</sup> Avenue.<sup>2</sup> We believe that the first workshop was both effective and well received. Four specific errors were discussed at the workshop. Thereafter, the volumes of three of these errors declined noticeably. CLECs raised 14 questions that required additional research; BA-NY provided responses to all questions by e-mail (to the industry change control email distribution list) within two weeks.

These group Flowthrough Workshops do not eclipse efforts with individual CLECs. For instance, BA-NY provides feedback to CLECs in the regular course of business during customer meetings. But the monthly Flowthrough Workshops provide the basis for *additional* individual discussion about LSR order quality because each Workshop is based on an extensive root cause analysis on the top flow through errors for the previous month. To enhance BA-NY's and CLEC's ability to analyze the causes of non-flow through orders, BA-NY recently developed the ability to produce a complete inventory of flow through errors by individual CLEC and by mode of entry (i.e., UNE-platform, UNE loops, and resale). This diagnostic tool should enable CLECs more effectively to manage their ordering process and to reduce ordering errors, which will increase BA-NY's flow through rates. In order to leverage that additional information, beginning with the December Flowthrough Workshop, BA-NY will offer to provide a CLEC-specific error

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<sup>2</sup> Workshops are being conducted monthly on the day preceding the monthly change control meetings to facilitate travel plans.

analysis and to meet individually with CLECs that are interested in exploring in more depth how the root cause information relates to their individual results. BA-NY will provide CLEC-specific error analysis at the same time it provides aggregate error-analysis in advance of subsequent Workshops.

#### Continuing Expansion of TISOC Capacity

The robustness of BA-NY's OSS means that UNE order volumes continue to increase dramatically. On a transaction basis, average daily UNE order volumes increased 45% from September to October, and 34% again from October to November (which had three holidays). Even with the marked gains in flow through apparent from the October enhancements, BA-NY recognizes that it must continue to increase the capacity of the TISOC to deal with increasingly complex resale orders, as well as the volumes of orders not yet eligible for Level 5 flow through.

By the end of December 1999, the TISOC will have 406 fully trained representatives available to assist CLECs in New York. A new center, located in Bowdoin, Massachusetts, will open on January 15, 2000, with additional capacity for 120 new TISOC representatives. Additional representatives will begin working at the Bowdoin center each month from January to April 2000, when a full complement will be in place.

In order to reduce training time and increase TISOC productivity in the face of increasingly complex orders, BA-NY has found two methods of adding experienced representatives to the TISOC workforce. First, the TISOC is annexing the General Business Service Center in Boston, and its 138 highly-trained retail representatives. The GBSC facilities and personnel will be added to the TISOC from March through July 2000. Second, the TISOC is augmenting its outsourcing capacity by adding 100 representatives to meet peak TISOC loads. In addition, as you know, BA-NY is continuously pursuing ways to improve its operating efficiency. These efforts are being aggressively applied to our wholesale operations to ensure that all available resources are utilized effectively.

These plans are solid: the funding has been committed, the spaces have been secured and the contracts have been approved. All told, TISOC capacity will grow from 400 representatives at the end of this year to over 770 by the middle of 2000.

#### Enhanced xDSL Performance

I also want to emphasize BA-NY's commitment to ensuring that DSL loop performance continues to improve. In particular, BA-NY commits to continue to participate actively and in good faith in the problem-solving efforts underway in the New York Commission's DSL collaborative commenced under the aegis of Case 97-C-0271. This collaborative process, which involves and is open to all xDSL providers in New York, has developed and on September 15, 1999, implemented and began measuring a cooperative testing method for provisioning xDSL over new loops; BA-NY will continue to refine this method in this forum. In addition, the collaborative is beginning to address line-sharing procedures; we will cooperate with the xDSL providers in designing appropriate line-sharing procedures. We are also addressing and will

address the concerns of DSL providers in upgrading the loop qualification process through the NYPSC collaborative.

Based upon the xDSL loop qualification and provisioning procedures already in place in NYPSC Case 97-C-0271, BA-NY has proposed several xDSL-specific metrics and standards to the NYPSC Carrier-to-Carrier ("C2C") collaborative for inclusion in the C2C guidelines. As a result of the DSL collaborative, BA-NY has implemented a plan relating to CLEC education and BA-NY training and manpower additions that has already increased provisioning performance for xDSL loops. In January 2000, BA-NY will share with the collaborative additional plans and timelines for cooperative improvement in provisioning performance. These plans and timelines will include continued CLEC education, CLEC forecasting, and BA-NY training and manpower additions. BA-NY is willing to have reasonable cooperative improvement plans adopted by the Commission as may be appropriate.

We also commit to recommend to the Commission adding the metrics described below to the critical measures reported in our Amended Performance Assurance Plan ("A.P.A.P.") as of the effective date of that Plan. These metrics are as follows:

1. PO-8 Manual Loop Qualification. This metric has two submetrics which measure manual loop qualification and engineering record request response times. The standard can be set at 95% within the established intervals (48 hours for loop qualification and 72 hours for engineering records). We will begin to report on this metric beginning with January performance.
2. PR-4 Missed Appointments. This metric has been refined to add five submetrics, one of which is being developed on an expedited basis. These submetrics report performance on the provisioning procedure that was developed in the collaborative and reflect the joint testing process developed by the collaborative. Although BA-NY believes a parity-based standard for these submetrics would be appropriate, given the evolving nature of the DSL process BA-NY recommends that, for purposes of the A.P.A.P., an absolute standard for these PR-4 submetrics be set at 85% for performance during the first quarter of 2000, 90% for performance during the second quarter, and 95% thereafter. Because an absolute standard is recommended for these submetrics, BA-NY also recommends, for the purposes of the A.P.A.P., and will recommend to the C2C collaborative, the adoption of an exclusion for "Missed for Facilities." This will exclude appointments missed due to the absence of suitable facilities after BA-NY has made a diligent effort to locate xDSL-compatible facilities. BA-NY reserves the right to suggest in the future an alternative, parity-based standard for this metric. BA-NY will begin to report on PR-4-14 and PR-4-15

beginning with January 2000 performance, and will report on the remaining subcategories beginning with April 2000 performance.

3. PR-6 % Installation Troubles. This submetric, PR-6-01, will be disaggregated to report the percent of installation troubles on xDSL loops within 30 days. For purposes of the A.P.A.P., BA-NY recommends, and will recommend to the C2C collaborative, that the standard for the disaggregated xDSL performance be set at parity with retail dispatch performance. BA-NY will begin to report on this metric beginning with January 2000 performance.

Very truly yours,

Randal S. Milch

Attachments

cc: All active parties to 97-C-0139 (by e-mail)  
All active parties to 97-C-0271 (by e-mail)  
Janet H. Deixler (by hand)

## ATTACHMENT 1

### Resale 12/18/9 System Enhancements

DOEE134

Form RS Data of Tag S2 – Ineligible for Flow Through, Sept.: 2087, Oct.: 3081, Nov. thru 11/24: 2938. Tag S2 is TNTER (Telephone Number, Terminal Number) on the Resale form. This is a hyphen issue and the system will now accept with or without, the request will Flow Through. This was the No. 1 message on the week ending 11/24 report.

EU Tag(s) for OrdType=C – Ineligible for Flow Through, Sept.: 961, Oct.: 1425, Nov. thru 11/24: 1129. OrdType=C is the Activity Code for Change Modification to an existing account. This code with the address fields on the End User form will now Flow Through. There are no rule changes. This was the No. 2 message on the week ending 11/24 report.

EU Tag(s) for OrdType=D – Ineligible for Flow Through, Sept.: 273, Oct.: 400, Nov. thru 11/24: 341. OrdType=D is the Activity Code for a Disconnect. This code with the address fields on the End User form will now Flow Through. There are no rule changes. This was the No. 10 message on the week ending 11/24/ report.

EU Tag(s) for OrdType=W – Ineligible for Flow Through, Sept.: 62, Oct.: 39, Nov. thru 11/24: 39. OrdType=D is the Activity Code for a Disconnect. This code with the address fields on the End User form will now Flow Through. There are no rule changes. This was the No. 151 message on the week ending 11/24 report.